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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA
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Order Instituting Rulemaking to Consider the Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006.	))))	Rulemaking 06-10-005

RESPONSE OF VERIZON CALIFORNIA INC. TO APPLICATIONS FOR REHEARING

Elaine M. Duncan
711 Van Ness, Suite 300
San Francisco, CA 94102
415/474-0468
415/474-6546 (Fax)
elaine.duncan@verizon.com

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Attorney for Verizon California Inc.

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Verizon respectfully submits this response to the applications for rehearing submitted by the Utility Reform Network (TURN) and the Greenlining Institute (Greenlining) of D.07-03-014 (the Decision), regarding the Commission's decision adopting procedures and General Order 169 implementing the Digital Infrastructure and Video Competition Act of 2006 (DIVCA). In contrast to the claims made in these applications, the Decision is thorough, well-reasoned, consistent with DIVCA and other applicable law, and fully supported by findings. For the following reasons, these applications should be denied.

INTRODUCTION AND SUMMARY

The parties seeking rehearing of the Decision fail to meet the standard of review set forth in Public Utilities Code §1757.1. That section limits rehearing, in pertinent part, to determining, "on the basis of the entire record," whether the decision is lawful, within the Commission's discretion, and supported by the findings.[1] On each issue raised by TURN and Greenlining, the Decision amply meets this test.

The Decision correctly determines that existing rules and processes adequately protect against any risk that basic ratepayers will finance the costs of deploying a video network, as provided in DIVCA. TURN's proposal for comprehensive monitoring to insure this result is a throwback to cost-of-service regulation and is not needed to enforce DIVCA's specific and narrow provisions in this area. TURN has made no showing that such monitoring is needed, and the Decision's determination that existing mechanisms are adequate is lawful and well-supported by the record.

[1] Pub. Util. Code § 1757.1.

Similarly, the Decision's determination to disallow protests in the franchise application process is well within the Commission's discretion and fully consistent with DIVCA's detailed provisions governing the substance and process for review of franchise applications. The opportunity for protest would add nothing to the Commission's determination whether an application is complete under DIVCA, and is inconsistent with DIVCA's timelines.

Finally, the Decision was correct in rejecting the availability of intervenor compensation awards in proceedings under DIVCA. DIVCA's clear statement that video services are *not* public utility services clearly means that the existing statutory scheme for compensation of "public utility customers" in Commission proceedings does not apply to video services. Therefore the only correct and lawful determination is to hold that intervenor compensation is not available in Commission proceedings relating to video franchising.

ARGUMENT

A. No New Monitoring Is Required to Deter "Cross-subsidization"

TURN claims that the Commission's failure to implement new processes to monitor and assess cross-subsidization under DIVCA is a "dereliction" of duty and abuse of its discretion.[2] This allegation of error arises from TURN's baseless and erroneous assumption that new monitoring processes are required to enforce DIVCA, when in fact they are not. The Decision's determination that it would be "relatively easy" to review any of the rate changes affected by DIVCA to determine their compliance with law[3] is a reasonable and lawful conclusion, supported by the record, and should be upheld.

[2] TURN Application for Rehearing (TURN) at 4, 5.
[3] Decision at 189.

As an initial matter, TURN's characterization of the issue as one of cross-subsidization, raising the specter that "new video enterprises" will be "built on the backs of residential basic telephone service ratepayers,"[4] is overbroad and incorrect. First, DIVCA does not even use the terms "cross-subsidization" or "cross subsidy." Rather, DIVCA contains a much narrower, more specific directive: a provider of video service under DIVCA "shall not increase [the] rate [of stand-alone, residential primary line basic telephone service] to finance the cost of deploying a video network".[5] As reiterated in the next section of DIVCA, this directive involves *stand-alone* basic service, not "basic telephone service that is *bundled* with other services and priced as a bundle."[6]

Not surprisingly, the universe of customers potentially affected by the price changes at issue is equally narrow. As the Commission found in the URF decision, D.06-08-030, the current technologically diverse communications market is "dominated" by bundled products,[7] and "the majority of communications services are sold in bundles and not on a stand-alone basis."[8] To address this narrow subset of potential rate changes – to a single service subscribed to by relatively few customers – TURN asks the Commission to institute extraordinarily complex and comprehensive new monitoring requirements to track the financial and engineering costs of both the video and basic telephone service networks at

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[4] TURN at 4.
[5] § 5940.
[6] § 5950 (emphasis added).
[7] D.06-08-030 at 75, note 298.
[8] D.06-08-030 at 60, note 229; id. at 189, note 714. Indeed, TURN specifically requested such information from Verizon on the record during hearings in the URF proceeding. See Tr. Vol. 4, p. 617, ll. 13-19 (February 1, 2006) (seeking "number and percent of the Verizon residence and business customers who buy only basic local exchange service.")

a very granular level.[9] Moreover, TURN apparently assumes that every dollar of revenue collected from sale of basic exchange service must be tracked to determine the purpose for which it is used.[10] Such draconian measures are not needed.

This kind of expansive monitoring scheme hearkens back decades to cost-of-service regulation, where monitoring regimes were implemented in anticipation of future events so as to control company actions. Here, however, such an approach is not necessary. Since the rates at issue are frozen until January 2009, only a rate change after that date would be subject to scrutiny. At the time of any such rate increase, should it occur, a variety of factors might bear on its validity under DIVCA, including whether and to what extent a video network is being deployed. The expected revenue generation must also be taken into account, since carriers who raise the price of any service in a competitive market will risk losing customers and reducing the overall revenues generated by that service. In the face of robust competition, the likelihood of successfully raising any single rate to finance the cost of deploying a multi-billion dollar video network is slim indeed.[11]

In contrast to TURN's costly and burdensome proposal, the Decision takes a reasonable approach, correctly and lawfully determining that it would be

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[9] See detailed monitoring proposals submitted in previous comments in this docket, e.g., TURN Comments, October 25, 2006, at 13-16 (recommending tracking of detailed investment, separations, engineering and financial data at the wirecenter level for a five year period); see also Opening Comments of DRA on the Proposed Decision of Commissioner Chong, February 5, 2007, at 11, note 23 (seeking annual reporting of financial and engineering costs of stand-alone basic telephone service and video service, and proposing further consideration in Phase 2).

[10] TURN at 5 (claiming that "the Commission has none of the data that would be necessary to make an informed determination of the purpose for which revenue collected from a change in basic telephone service rates are being used.")

[11] Indeed, Verizon has been deploying its video network in California for the last three years, with *no* increases in the rate of stand alone residential basic exchange service.

"relatively easy" and well within the Commission's existing competence to assess future price increases for compliance with DIVCA at the time they are proposed. Although TURN dismisses out of hand a host of existing protections recounted in the Decision – tariff reviews, audits, formal investigations, and federal cost assignment and allocation rules[12] – it defies common sense that *none* of these mechanisms will provide the Commission the tools it will need to assess future price changes for compliance with DIVCA. Moreover, the Commission retains expansive statutory authority to examine the books and records of any company providing regulated service, and is free to seek whatever data it feels is necessary in the event a future price increase raises concerns under DIVCA.[13] TURN's fear that these measures will prove insufficient is unreasonable and unsupported.

Finally, TURN's contrast of this provision with the Commission's enforcement of DIVCA's build and non-discrimination provisions[14] is a red herring. DIVCA itself imposed substantial detailed reporting and enforcement obligations on carriers to address non-discrimination, in contrast to its complete silence in this area. The Decision's determination to focus greater regulatory attention on the build and non-discrimination provisions of DIVCA is simply

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[12] TURN at 7-9.

[13] TURN makes much of efforts to seek forbearance from enforcement of certain FCC cost assignment rules. TURN at 9. Many of these rules have not been updated in decades, and review to determine their continued validity in an intermodal environment is entirely proper. Where basic telephone rates are no longer based on cost, and the market faces extensive intermodal competition, carriers like Verizon have neither the incentive to overstate cost nor the ability to raise basic rates above a market-based price. See *Appropriate Framework for Broadband Access to Internet Over Wireline Facilities*, CC Docket No. 02-33, Report and Order FCC 05-150 (Sept. 23, 2005) ¶ 83 (where costs no longer used to set rates, safeguards against cross-subsidization no longer required); ¶ 133 (cost allocation results no longer affect basic rates; reduced LEC incentives to overstate costs reduces need for burdensome cost allocation processes). Even if the FCC chooses to no longer enforce these rules, the Commission retains the options discussed above to obtain any information it may need in the future to enforce DIVCA.

[14] TURN at 10.

another indication of the Decision's close adherence to the law. TURN's supposition otherwise is wrong. The Decision is well supported and consistent with the law in its treatment of this issue, and should be upheld.

B. Denial of the Opportunity to Protest Applications Is Fully Consistent with DIVCA

At its core, TURN's objection rests on its view that the opportunity to protest applications would better fulfill DIVCA's "broad range of purposes and intent" and would be more consistent with the Commission's "long-standing . . . practice" of permitting protests to applications.[15] However, TURN's policy disagreement with the Decision on this issue does not come close to demonstrating legal error or abuse of discretion. Rather, the Decision's carefully considered determination not to permit protests of applications was a proper exercise of the Commission's discretion,[16] and fully consistent with DIVCA's detailed limitations on the Commission's substantive review of applications (to determine their completeness) and the strict timeframes in which that review must be conducted. The Decision correctly determined that allowing protests would not contribute to its review and determination whether an application was complete or not,[17] and would almost certainly risk violating DIVCA's tight review deadlines, as Greenlining's comments themselves demonstrate.[18]

[15] TURN at 15-17.

[16] As both TURN (at 12) and Greenlining (at footnote 6, no page referenced), DIVCA provides that the Commission retains all of its existing authority under state and federal statutes. This includes the discretion to set its own procedures consistent with law, Pub. Util. Code §1701, which it has done here.

[17] The Decision did note that local entities might bring evidence of an applicant's statutory ineligibility to the Commission pursuant to §§ 5840 (violation of nonappealable order relating to customer service) or 5930 (subject to stipulation of consent decree), but that doing so would not constitute a protest. Decision at 98.

[18] Indeed, in its opening comments on the proposed decision, Greenlining suggested a 15 day protest cycle, 15 day hearing determination, and ***120 days*** for a Commission decision. Greenlining Comments on Proposed Draft Decision, February 2, 2007, at 11.

This result is fully consistent with the unique position that video franchising occupies in Commission regulation, a position mandated by DIVCA's caution that video service is *not* a public utility service. Plainly, Commission staff is fully capable of assessing whether an application is complete as prescribed in DIVCA, without external assistance. Contrary to Greenlining's utter speculation that the legislature deliberately chose the Public Utilities Commission to insure the opportunity for public protest and intervenor compensation,[19] it is DIVCA's strict limitations on the franchising agency that fully support the Decision's result on this issue.[20]

Moreover, neither TURN nor Greenlining acknowledge existing Commission precedent for streamlined registration processes without explicit opportunity for public comment. The Commission currently registers electric service providers (ESPs) in "an exercise of [its] licensing function" without regulating the rates, terms or conditions of service provided by ESPs,[21] and no opportunity for public comment or protest exists in that process.[22] Given DIVCA's clear and overriding goal to establish a similarly streamlined process for video franchise application review, the Commission's determination to depart from the protest process is well-reasoned, fully supported, and not by any stretch of the imagination an abuse of discretion.

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[19] Greenlining at Section II.
[20] It is worth noting that the application process and timelines appeared very early in the legislative amendment process and remained relatively unchanged, regardless of the identity of the agency selected to administer them. This demonstrates that the Legislature intended for the Commission to conform its processes to DIVCA, not vice versa.
[21] Pub. Util. Code section 394(f).
[22] See, e.g., D.97-05-040 (adopting registration procedures and form); D.03-12-015 (expanded registration procedures).

C. The Decision's Disallowance of Intervenor Compensation Is Lawful

Both TURN and Greenlining ignore the fundamental conflict between the statutory provisions governing intervenor compensation[23] and DIVCA. The former apply only to specified "utilities" and "utility customers," while DIVCA provides that video franchise holders are *not* utilities, and video service is *not* a public utility service.[24] There is no intersection between these statutes; they are fundamentally inconsistent. Although TURN engages in a lengthy analysis of the intervenor compensation statutes in an effort to bolster its claim that intervenor compensation is available in "all Commission proceedings,"[25] it ignores its own recitation of §1801's intent that the statutory purpose is to award compensation to "*public utility* customers" participating in those proceedings.[26] Clearly, video service customers are not public utility customers.

In addition, TURN and Greenlining completely ignore the requirement that intervenor compensation awards are to be paid by the affected customers. Section 1807 mandates *full recovery in rates* of any compensation award paid by a utility, but under DIVCA the Commission is *precluded* from regulating video service rates, and therefore from complying with §1807.[27] Again, these two provisions are irreconcilable. Furthermore, since video service customers cannot be required to fund the compensation awards of organizations purportedly representing their interests, franchise holders themselves would be required to fund any Commission-ordered awards. Such a result would constitute an additional requirement outside the scope of DIVCA, and would therefore be

[23] Public Util. Code §§ 1800 et seq.
[24] § 5820(c).
[25] TURN at 18-20.
[26] TURN at 18 (emphasis added); Pub. Util. Code § 1801.
[27] § 5820(c).

unlawful.[28] The Legislature did not provide for intervenor compensation awards in DIVCA, therefore, the Commission is barred from imposing such a requirement.[29]

The Commission's obligation in interpreting these statutes is to harmonize them to the extent possible; the only way to do so is to conclude that intervenor compensation does not apply under DIVCA.[30]

CONCLUSION

The Decision establishing state-issued video franchise rules and procedures pursuant to the Digital Infrastructure and Video Competition Act of 2006 is a comprehensive, well-reasoned decision that is supported by substantial record evidence and consistent with applicable legal requirements. As such, rehearing should be denied and the Decision should be upheld in its entirety.

Dated: April 19, 2007

Respectfully submitted,

By: Elaine M. Duncan
ELAINE M. DUNCAN

Attorney for Verizon California Inc.
711 Van Ness Avenue, Suite 300
Tel: 415-474-0468
Fax: 415-474-6546
San Francisco, CA 94102
E-mail: Elaine.duncan@verizon.com

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[28] § 5840(a).

[29] See, e.g., *Consumers' Lobby Against Monopolies v. PUC*, 25 Cal. 3d 891, 913, n. 10, 160 Cal. Rptr, 124 (1979)(decision to establish system for compensating public interest organizations for participation in PUC's quasi-legislative proceedings is legislative prerogative).

[30] *Cacho v. Boudreau*, 40 Cal. 4th 341; 2007 Cal. LEXIS 217 (2007)("implied amendment" to existing statute disfavored; adopted only when there is no other rational way to harmonize statutes); citing *In re Sean W*, 127 Cal. App. 4th 1177; 26 Cal. Rptr. 3d 248 (2005)(later-enacted statute will not be interpreted so as to modify scope or effect of existing statute unless the "later-enacted statute creates such a conflict with existing law that there is no rational basis for harmonizing the two").

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Ave., Ste. 300, San Francisco, CA 94102; I have this day served a copy of the foregoing:

RESPONSE OF VERIZON CALIFORNIA INC.
TO APPLICATIONS FOR REHEARING

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of April, 2007, at San Francisco, California.

/s/Sonja Killingsworth
SONJA KILLINGSWORTH

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Appearance

WILLIAM H. WEBER
ATTORNEY AT LAW
CBEYOND COMMUNICATIONS
320 INTERSTATE NORTH PARKWAY
ATLANTA, GA 30339

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

DAVID C. RODRIGUEZ
STRATEGIC COUNSEL
523 WEST SIXTH STREET, SUITE 1128
LOS ANGELES, CA 90014

MAGGLE HEALY
CITY OF REDONDO BEACH
415 DIAMOND STREET
REDONDO BEACH, CA 90277

GERALD R. MILLER
CITY OF LONG BEACH
333 WEST OCEAN BLVD.
LONG BEACH, CA 90802

TRACEY L. HAUSE
ADMINISTRATIVE SERVICES DIRECTOR
CITY OF ARCADIA
240 W. HUNTINGTON DRIVE
ARCADIA, CA 91007

CYNTHIA J. KURTZ
CITY MANAGER
CITY OF PASADENA
117 E. COLORADO BLVD., 6TH FLOOR
PASADENA, CA 91105

ROB WISHNER
CITY OF WALNUT
21201 LA PUENTE ROAD
WALNUT, CA 91789

ESTHER NORTHRUP
COX CALIFORNIA TELCOM, LLC
5159 FEDERAL BLVD.

KIMBERLY M. KIRBY
ATTORNEY AT LAW
MEDIASPORTSCOM P.C.

SAN DIEGO, CA 92105

3 PARK PLAZA, SUITE 1650
IRVINE, CA 92614

BILL NUSBAUM
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

BARRY FRASER
CIYT OF SAN FRANCISCO
875 STEVENSON STREET, 5TH FLOOR
SAN FRANCISCO, CA 94103

IZETTA C.R. JACKSON
OFFICE OF THE CITY ATTORNEY
CITY OF OAKLAND
1 FRANK H. OGAWA PLAZA, 10TH FLR.
OAKLAND, CA 94103

WILLIAM L. LOWERY
MILLER & VAN EATON, LLP
580 CALIFORNIA STREET, SUITE 1600
SAN FRANCISCO, CA 94104

DAVID J. MILLER
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2018
SAN FRANCISCO, CA 94105

FASSIL FENIKILE
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

SYREETA GIBBS
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR
SAN FRANCISCO, CA 94105

TOM SELHORST
AT&T CALIFORNIA
525 MARKET STREET, 2023
SAN FRANCISCO, CA 94105

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

WILLIAM L. LOWERY
MILLER VAN EATON, LLP
400 MONTGOMERY STREET, SUITE 501
SAN FRANCISCO, CA 94121

WILLIAM L. LOWERY
MILLER VAN EATON, LLP
400 MONTGOMERY STREET, SUITE 501
SAN FRANCISCO, CA 94121

ALLEN S. HAMMOND, IV
PROFESSOR OF LAW
SANTA CLARA UNIVERSITY SHCOOL OF LAW
500 EL CAMINO REAL
SANTA CLARA, CA 94305

ALEXIS K. WODTKE
STAFF ATTORNEY
CONSUMER FEDERATION OF CALIFORNIA
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94402

DOUGLAS GARRETT
COX COMMUNICATIONS
2200 POWELL STREET, STE. 1035
EMERYVILLE, CA 94608

GLENN SEMOW
DIRECTOR STATE REGULATORY & LEGAL AFFAIR
CALIFORNIA CABLE & TELECOMMNICATIONS
360 22ND STREET, NO. 750
OAKLAND, CA 94612

JEFFREY SINSHEIMER
CALIFORNIA CABLE & TELECOMMUNICATIONS
360 22ND STREET, 750
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL & REGULATORY AFFAIRS
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARIA POLITZER
LEGAL DEPARTMENT ASSOCIATE
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARK RUTLEDGE
TELECOMMUNICATIONS FELLOW
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLR.
BERKELEY, CA 94704

PHILIP KAMLARZ
CITY OF BERKELEY
2180 MILVIA STREET
BERKELEY, CA 94704

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

WILLIAM HUGHES
ASSISTANT CITY ATTORNEY
CITY OF SAN JOSE
16TH FLOOR
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113-1900

GREG R. GIERCZAK
EXECUTIVE DIRECTOR
SURE WEST TELEPHONE
PO BOX 969
200 VERNON STREET
ROSEVILLE, CA 95678

PATRICK WHITNELL
LEAGUE OF CALIFORNIA CITIES
1400 K STREET
SACRAMENTO, CA 95814

MARIE C. MALLIETT
THE COMMUNICATIONS WORKERS OF AMERICA
2870 GATEWAY OAKS DRIVE, SUITE 100

SACRAMENTO, CA 95833-3509

Information Only

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

ALOA STEVENS
DIRECTOR, GOVERNMENT&EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 708970
SANDY, UT 84070-8970

KEN SIMMONS
ACTING GENERAL MANAGER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1400
200 N. MAIN STREET
LOS ANGELES, CA 90012

LONNIE ELDRIDGE
DEPUTY CITY ATTORNEY
CITY ATTORNEY'S OFFICE
CITY HALL EAST, SUITE 700
200 N. MAIN STREET
LOS ANGELES, CA 90012

RICHARD CHABRAN
CALIFORNIA COMMUNITY TECHNOLOGY POLICY
1000 ALAMEDA STREET, SUITE 240
LOS ANGELES, CA 90012

ROY MORALES
CHIEF LEGISLATIVE ANALYST
CIYT OF LOS ANGELES
CITY HALL
200 N. SPRING STREET, 2ND FLOOR
LOS ANGELES, CA 90012

WILLIAM IMPERIAL
TELECOMMUNICATIONS REG. OFFICER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1255
200 N. MAIN STREET
LOS ANGELES, CA 90012

GREG FUENTES
11041 SANTA MONICA BLVD., NO.629
LOS ANGELES, CA 90025

JONATHAN L. KRAMER
ATTORNEY AT LAW
KRAMER TELECOM LAW FIRM
2001 S. BARRINGTON AVE., SUITE 306
LOS ANGELES, CA 90025

MICHAEL J. FRIEDMAN
VICE PRESIDENT
TELECOMMUNICATIONS MANAGEMENT CORP.
5757 WILSHIRE BLVD., SUITE 635
LOS ANGELES, CA 90036

STEVEN LASTOMIRSKY
DEPUTY CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101

SUSAN WILSON
DEPUTY CITY ATTORNEY
RIVERSIDE CITY ATTORNEY'S OFFICE
3900 MAIN STREET, 5TH FLOOR
RIVERSIDE, CA 92522

AARON C. HARP
OFFICE OF THE CITY ATTORNEY
CITY OF NEWPORT BEACH

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK

3300 NEWPORT BLVD
NEWPORT BEACH, CA 92658-8915

711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

WILLIAM K. SANDERS
DEPUTY CITY ATTORNEY
OFFICE OF THE CITY ATTORNEY
1 DR. CARLTON B. GOODLETT PLACE,ROOM 234
SAN FRANCISCO, CA 94102-4682

MALCOLM YEUNG
STAFF ATTORNEY
ASIAN LAW CAUCUS
939 MARKET ST., SUITE 201
SAN FRANCISCO, CA 94103

RANDLOPH W. DEUTSCH
SIDLEY AUSTIN LLP
555 CALIFORNIA STREET, SUITE 2000
SAN FRANCISCO, CA 94104

GREG STEPHANICICH
RICHARDS, WATSON & GERSHON
44 MONTGOMERY STREET, SUITE 3800
SAN FRANCISCO, CA 94104-4811

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

NOEL GIELEGHEM
COOPER, WHITE & COOPER LLP
201 CALIFORNIA ST. 17TH FLOOR
SAN FRANCISCO, CA 94111

JOSE E. GUZMAN, JR.
NOSSAMAN GUTHNER KNOX & ELLIOTT LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

GRANT GUERRA
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
250 HAMILTON AVENUE, 8TH FLOOR
PALO ALTO, CA 94301

DAVID HANKIN
VP, GOVERNMENT AFFAIRS
RCN CORPORATION
1400 FASHION ISLAND BLVD., SUITE 100
SAN MATEO, CA 94404

MARK T. BOEHME
ASSISTANT CITY ATTORNEY
CITY OF CONCORD
1950 PARKSIDE DRIVE
CONCORD, CA 94510

PETER DRAGOVICH
ASSISTANT TO THE CITY MANAGER
CITY OF CONCORD
1950 PARKSIDE DRIVE, MS 01/A
CONCORD, CA 94519

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

SCOTT MCKOWN
C/O CONT OF MARIN ISTD
MARIN TELECOMMUNICATION AGENCY
371 BEL MARIN KEYS BOULEVARD
NOVATO, CA 94941

BARRY F. MCCARTHY, ESQ.
ATTORNEY AT LAW
MCCARTHY & BARRY LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

TIM HOLDEN
SIERRA NEVADA COMMUNICATIONS
PO BOX 281
STANDARD, CA 95373

CHARLES BORN
MANAGER, GOVERNMENT & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS OF CALIFORNIA
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

KELLY E. BOYD
NOSSAMAN,GUTHNER,KNOX AND ELLIOTT
915 L STREET, SUITE 1000
SACRAMENTO, CA 95814

ROBERT A. RYAN
COUNTY COUNSEL
COUNTY OF SACRAMENTO
700 H STREET, SUITE 2650
SACRAMENTO, CA 95814

SUE BUSKE
THE BUSKE GROUP
3001 J STREET, SUITE 201
SACRAMENTO, CA 95816

State Service

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE NEVILLE
CALIF PUBLIC UTILITIES COMMISSION
CARRIER BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

APRIL MULQUEEN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JENNIE CHANDRA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5141
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPH WANZALA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL OCHOA
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEVEN KOTZ
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5204
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DELANEY HUNTER
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

EDWARD RANDOLPH
CHIEF CONSULTANT
ASSEMBLY COMMITTEE/UTILITIES AND COMMERC
STATE CAPITOL
SACRAMENTO, CA 95814

RANDY CHINN
SENATE ENERGY UTILITIES & COMMUNICATIONS
STATE CAPITOL, ROOM 4040
SACRAMENTO, CA 95814

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